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BKPL-EG Series I Trust
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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IN RE:	: CASE NO.: 19-27226-JNP
	:
Christopher J. Galloway	: CHAPTER: 13
	:
Debtor	: HON. JUDGE.:
	: Jerrold N. Poslusny Jr.
	:
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**CERTIFICATION OF DEBTOR(S) DEFAULT AND REQUEST FOR ENTRY OF AN
ORDER VACATING THE AUTOMATIC STAY AS TO REAL PROPERTY AS TO
SECURED CREDITOR**

I Phoua Her hereby certify as follow:

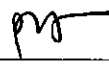
1. I am a Bankruptcy Asset Manager for SN Servicing Corporation, LLC as servicer for U.S. Bank Trust National Association, as Trustee of BKPL-EG Series I Trust, a secured creditor of the debtor.
2. After the debtor's first default in payments, Secured Creditor filed a Motion for Relief from Stay on 3/31/2020 (Docket #38). Subsequently, Secured Creditor resolved the issues with the Debtor's attorney and an Order was entered on 06/19/2020(Docket #49)

resolving the Motion for Relief from Stay. After the debtor's Second default in payments, Secured Creditor filed a Creditor's Certification of Default on 11/03/2020 (Docket #63). Subsequently, Secured Creditor resolved the issues with the Debtor's attorney and an Order was entered on 01/05/2021 (Docket #74) resolving the Creditor's Certification of Default. The duly entered Order provided for, among other things, the Debtor to resume monthly mortgage payments beginning March 1, 2021. The debtor was to put the \$500.00 in attorney fees into a modified plan. The remaining terms of the Order are set forth in the annexed **Exhibit A**, a true copy of the Order resolving the original Motion for Relief from Stay. The Court's attention is respectfully directed to the default clause of the Order providing for the submission of the within Certification and form of Order upon default.

3. As of the execution of this certification, according to Secured Creditor's records, the Debtor has failed to comply with the terms of the Order by failing to make the monthly mortgage payments. The Debtor is currently due for 11 monthly payments (March 2021–January 2022) x \$1,195.11 + 3 monthly payments (February 2022 – April 2022) x \$1,250.76 + Late charges \$67.80, less suspense of \$228.93. The total amount past due is \$16,737.36. The above-mentioned payments are more than 30 days delinquent.
4. Simultaneously with the submission to the Court of the within Certification and proposed form of Order, copies of these documents are being served upon the Debtor, Debtor's attorney and the Standing Trustee.
5. Based on the above, the Debtor has failed to meet the conditions to continue the Automatic Stay, and it is respectfully requested that this Court enter an Order Vacating the Automatic Stay and co debtor stay as to Real Property as to Secured Creditor.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 5/26/22



Signature

POST CONSENT ORDER PAYMENTS (Filed 09/03/2019)

Amount Due	Due Date	Mo/Yr Payment Applied	Amount Received	Date of Payment	Running Suspense
\$1,195.11	03/01/2021	N/A	\$0.00	N/A	\$228.93
\$1,195.11	04/01/2021	N/A	\$0.00	N/A	
\$1,195.11	05/01/2021	N/A	\$0.00	N/A	
\$1,195.11	06/01/2021	N/A	\$0.00	N/A	
\$1,195.11	07/01/2021	N/A	\$0.00	N/A	
\$1,195.11	08/01/2021	N/A	\$0.00	N/A	
\$1,195.11	09/01/2021	N/A	\$0.00	N/A	
\$1,195.11	10/01/2021	N/A	\$0.00	N/A	
\$1,195.11	11/01/2021	N/A	\$0.00	N/A	
\$1,195.11	12/01/2021	N/A	\$0.00	N/A	
\$1,195.11	01/01/2022	N/A	\$0.00	N/A	
\$1,250.76	02/01/2022	N/A	\$0.00	N/A	
\$1,250.76	03/01/2022	(NSF)	\$5,000.00	3/14/2022	
\$1,250.76	04/01/2022	N/A	\$0.00	N/A	
Total: \$16,898.49					Total: \$228.93

Monthly payments past due: 11 mos. x **\$1,195.11** (Monthly Payments 03/2021) + 3 mos. x **\$1,250.76** x Late charges **67.80** x (Suspense) **\$228.93** = **\$16,737.36** as of **05/12/2022**.

Effective current monthly payment is comprised of:

Principal & Interest	\$565.00
Escrow	\$685.76
Other	\$0.00
TOTAL	\$1,250.76

If the monthly payment has changed during the pendency of the case, please explain (attach separate sheet(s) if necessary):

02/06/2020 Notice of Mortgage Payment Change effective 10/1/2020

01/11/2022 Notice of Mortgage Payment Change effective 02/01/2022

Pre-petition arrears: \$29,469.39

I certify under penalty of perjury that the foregoing is true and correct.

5/26/22
Date

PA

Jonathan Schwalb, Esq.
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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IN RE:	: CASE NO.: 19-27226-JNP
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Christopher J. Galloway	: CHAPTER: 13
	:
Debtor	: HON. JUDGE.:
	: Jerrold N. Poslusny Jr.
	:
	: :
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ORDER VACATING AUTOMATIC STAY AND CO-DEBTOR STAY

The relief set forth on the following page numbered two (2) is hereby **ORDERED**.

Upon the motion of SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of BKPL-EG Series I Trust, on behalf of its successors and/or assigns (hereinafter collectively “Secured Creditor” and/or “Movant”) under Bankruptcy Code section 362(a) for relief from the automatic stay as to certain property as hereinafter set forth, and for cause shown, it is

ORDERED that the automatic stay of Bankruptcy Code Section 362(a) is vacated to permit the Movant to institute or resume and prosecute to conclusion one or more actions in the court(s) of appropriate jurisdiction to pursue the movant's rights in the following:

[x] Real property commonly known and more fully described as: 7759 Corbett Avenue, Pennsauken, NJ 08109,

ORDERED that the movant may join the debtor and any trustee appointed in this case as defendants in its action(s) irrespective of any conversation to any other chapter of the Bankruptcy Code; and it is further

ORDERED, that the stay afforded by 11 U.S.C. §362(a) be, and is hereby, modified to permit SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of BKPL-EG Series I Trust, it's successors and/or assigns, to pursue its rights under applicable state law with respect to the premises 7759 Corbett Avenue, Pennsauken, NJ 08109,; and it is further

ORDERED, that the Co-Debtor stay against “Beth Galloway” is lifted pursuant to 11 U.S.C. 1301(c); and it is further

ORDERED, that the instant order is binding in the event of a conversion; and it is further

ORDERED, that the Movant is granted reasonable attorney fees in the amount of \$200.00; and it is further

ORDERED, that the trustee be informed of any surplus monies resulting from the sale of the collateral.

ORDERED, that the movant shall serve this order on the debtor, any trustee, and any other party who entered an appearance on the motion.

Exhibit “A”



Order Filed on January 5, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

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Attorneys for Secured Creditor BSI Financial Services
as servicer for Wilmington Savings Fund Society,
FSB, Acting not in its individual capacity but solely as
Trustee of Southside NSP Trust 2017-1

In Re:

Christopher J. Galloway,

Debtor(s).

Case No.: 19-27226-JNP

Chapter: 13


Hearing Date:
December 8, 2020

Hon. Judge:
Jerrold N. Poslusny, Jr.

CONSENT ORDER RESOLVING MOTION TO VACATE STAY

The consent order set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: January 5, 2021



Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court

Applicant: BSI Financial Services as servicer for Wilmington Savings Fund Society, FSB, Acting not in its individual capacity but solely as Trustee of Southside NSP

Applicant's Counsel: Friedman Vartolo LLP

Debtor's Counsel: Daniel L. Reinganum

Property (Collateral): 7759 Corbett Avenue, Pennsauken, NJ 08109

Relief Sought:

- Relief from Automatic Stay

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of Post-Petition Arrearages:

- The Debtor is due for attorney fees in the amount of \$500.00.

Total Arrearages Due: \$500.00

2. Cure for Post-Petition Arrearages:

- Remaining balance of arrears, in the amount of \$500.00, shall be paid through a modified plan, to be filed within fourteen (14) days of the entered order
- Beginning on March 1, 2021, regular monthly payments shall resume in the amount of \$1,195.11, or as further defined by the terms of the Note, Mortgage, or any payment change notices.

3. Payments to the Secured Creditor shall be made to the following address:

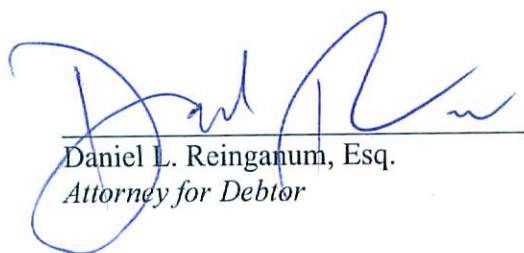
- Payments: BSI Financial Services
314 S. Franklin Street
P.O. Box 517
Titusville, PA 16354

In the event of default:

If the Debtor(s) fails to file the modified plan later than fourteen (14) days after entry of the order, or fails to make the regular monthly payments within thirty (30) days of the date the payments are due, then the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, Certification specifying the Debtor(s)'s failure to comply with this Order. At the time the Certification is filed with the Court, a copy of

the Certification shall be sent to the Chapter 13 Trustee, the Debtor(s), and the Debtor(s)'s Attorney.

The undersigned hereby consent to the form and entry of the foregoing order.



Daniel L. Reinganum, Esq.
Attorney for Debtor

/s/ Jonathan Schwalb, Esq.
Jonathan Schwalb, Esq.
Attorney for Secured Creditor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

Case No.: _____

Chapter: _____

Adv. No.: _____

Hearing Date: _____

Judge: _____

CERTIFICATION OF SERVICE

1. I, _____ :

☐ represent _____ in this matter.

☐ am the secretary/paralegal for _____, who represents
_____ in this matter.

☐ am the _____ in this case and am representing myself.

2. On _____, I sent a copy of the following pleadings and/or documents
to the parties listed in the chart below.

3. I certify under penalty of perjury that the above documents were sent using the mode of service
indicated.

Date: _____

Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
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